

**LITE DEPALMA GREENBERG & RIVAS, LLC**

Joseph J. DePalma (JD-7697)  
Susan D. Pontoriero (SP-0463)  
Two Gateway Center, 12<sup>th</sup> Floor  
Newark, New Jersey 07102  
973-623-3000  
Proposed Liaison Counsel

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**[ELECTRONICALLY FILED]**

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EARL MAITLAND, individually and on )  
behalf of all others similarly situated, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )  
 )  
Defendants. )

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Civil Action No. 2:04-CV-2123 (JAG)

[Captions continued on next page]

**NOTICE OF MOTION OF MOVANT MAX INTERNATIONAL  
BROKER/DEALER CORP. TO CONSOLIDATE ACTIONS,  
TO BE APPOINTED LEAD PLAINTIFF AND FOR APPROVAL OF LEAD  
PLAINTIFF'S SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

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HENRY FURINO, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2132 (JAG)

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JAY WASSERMAN, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2133 (JAG)

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RICHARD M. YARBRO, on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2160 (JAG)

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[Captions continued on next page]

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SARAH SONTAG, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2162 (JAG)

FRED DEN, on behalf of himself and all )  
others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2201 (JAG)

RICHARD JACOBS, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2231 (JAG)

[Captions continued on next page]

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BERNARD SAGGAU, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2232 (JAG)

BONNIE ROST, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2245 (JAG)

ABRAHAM MEISNER, individually and )  
on behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and WILLIAM P. )  
KEANE, )

Defendants. )

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Civil Action No. 2:04-CV-2246 (JAG)

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MILTON PFEIFFER, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2314 (JAG)

ANGELICA L. FURLA, on behalf of )  
herself and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., LORETTA M. ITRI, and )  
WILLIAM P. KEANE, )

Defendants. )

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Civil Action No. 2:04-CV-2392 (JAG)

JOHN F. ELLIOT, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, WILLIAM P. KEANE, and )  
LORETTA M. ITRI, )

Defendants. )

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Civil Action No. 2:04-CV-2466 (JAG)

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BARRY GERARD, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., LORETTA M. ITRI, )  
M.D., and WILLIAM P. KEANE, )

Defendants. )

Civil Action No. 2:04-CV-2471 (JAG)

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JOHN F. ELLIOT, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, WILLIAM P. KEANE, and )  
LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2498 (JAG)

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DAVID GREENBERG, on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2576 (JAG)

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CASEY M. MCGUANE, on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., LORETTA M. ITRI, and )  
WILLIAM P. KEANE )

Defendants. )

Civil Action No. 2:04-CV-2581 (JAG)

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HAROLD FULLEN, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2664 (JAG)

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CORY HECHLER, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2665 (JAG)

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[Captions continued on next page]

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WILLIAM T. DEANE, on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., LORETTA M. ITRI, and )  
WILLIAM P. KEANE )

Defendants. )

Civil Action No. 2:04-CV-2876 (JAG)

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ARTHUR SIEGEL, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., and LORETTA M. ITRI, )

Defendants. )

Civil Action No. 2:04-CV-2908 (JAG)

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JOHN T. JACOBUS, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

GENTA, INC., RAYMOND P. )  
WARRELL, JR., LORETTA M. ITRI, and )  
WILLIAM P. KEANE )

Defendants. )

Civil Action No. 2:04-CV-2936 (JAG)



PLEASE TAKE NOTICE that Max International Broker/Dealer Corp. (“Movant” or “Max International”), by its counsel, will hereby move will hereby move before the Honorable Joseph A. Greenaway, U.S.D.J., at the United States District Court for the District of New Jersey, at the Martin Luther King Jr. Federal Building & Courthouse, Newark, New Jersey 07101, on a date and at such time as may be designated by the Court, for an Order: (i) consolidating for all purposes the above-captioned related actions pursuant to Fed. R. Civ. P. 42(a); (ii) appointing Max International as lead plaintiff; (iii) approving Max International’s selection of the law firm of Schiffrin & Barroway, LLP to serve as lead counsel; (iv) approving Max International’s selection of the law firm of Lite DePalma Greenberg & Rivas, LLC to serve as liaison counsel; and (v) granting such other and further relief as the Court may deem just and proper. In support of this motion, Movant will rely upon the accompanying Memorandum of Law and Declaration of Susan D. Pontoriero and the exhibits annexed thereto. A proposed form of Order is submitted herewith.

Dated: July 6, 2004.

Respectfully submitted,

**LITE DEPALMA  
GREENBERG & RIVAS, LLC**

By: /s/ Joseph J. DePalma  
Joseph J. DePalma (JD-7697)  
Susan Pontoriero ( SP-0463)  
Two Gateway Center, 12<sup>th</sup> Floor  
Newark, New Jersey 07102  
Telephone: (973) 623-3000  
Facsimile: (973) 623-0211

**Proposed Liaison Counsel**

**SCHIFFRIN & BARROWAY, LLP**

Stuart L. Berman

Darren J. Check

Sean M. Handler

Three Bala Plaza East, Suite 400

Bala Cynwyd, Pennsylvania 19004

Telephone: (610) 667-7706

Facsimile: (610) 667-7056

**Proposed Lead Counsel**